

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

---

UNITED STATES OF AMERICA,  
Plaintiff,

v.

Case No. 18-CR-145

ROBERT HOFSCHULZ,  
Defendant.

---

**MOTION TO TRAVEL TO WESTERN DISTRICT OF WISCONSIN AND/OR  
INCLUDE LINCOLN COUNTY, WISCONSIN, IN HIS PERMISSIBLE TRAVEL  
ALLOWANCES**

---

NOW COMES the Defendant, Robert Hofschulz, by and through his attorneys, Kohn Smith Roth Law Offices, by Attorney Jonathan C. Smith, and upon all the files and record had heretofore herein hereby respectfully moves this Honorable Court for the entry of an Order allowing him to travel to his vacation property located at N8587 Faust Road, Tomahawk, Wisconsin, 54487, in Lincoln County in the Western District of Wisconsin, from October 25-28, 2018. The undersigned has communicated with AUSA Zachary Corey who has indicated he does not have an objection to this travel request.

Counsel would note that Lincoln County is immediately adjacent to the Eastern District of Wisconsin and therefore, should the Court grant this request, since it is possible this request could later be repeated, it is submitted that perhaps his previously imposed travel restrictions to the Eastern District of Wisconsin and Florida be expanded to include Lincoln County to avoid unnecessary filings with the Court.

Dated at Milwaukee this 18<sup>th</sup> day of October, 2018.

Respectfully Submitted,

**KOHN SMITH ROTH**  
Attorneys for the Defendant  
s/ Jonathan C. Smith  
Jonathan C. Smith  
SBN: 1022413

P.O. Address:  
1110 N. Old World Third Street  
Suite 620  
Milwaukee, WI 53203  
Phone: 414.273.0203  
Fax: 414.273.8408  
Email: [jcskas@gmail.com](mailto:jcskas@gmail.com)